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March 22, 2022

The Honorable Maryellen Noreika
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801

Re: CBV, Inc. v. ChanBond, LLC, 1:21-cv-01456-MN

Dear Judge Noreika,

We write to inform the Court that we are in the process of scheduling a teleconference with counsel of record in the above referenced matter in accordance with Local Rule 7.1.1. Counsel for Defendant ChanBond, LLC, Defendant Deirdre Leane and Intervener IPNAV, LLC have identified availability for Thursday, March 24, 2022. We are still waiting to hear back from counsel for Plaintiff, CBV, Inc. as to their availability.

We previously did not file a Local Rule 7.1.1. Statement because we believed our clients Kamal Mian and Gregory Collins derivatively on behalf of Unified Online, Inc. were considered “non-parties” to the above referenced matter under Local Rule 7.1.1. because their Motion to Intervene [D.I. 34] is currently pending.

We have already been in contact with Akiva Cohen, Esq., counsel for Intervenors Deirdre Leane and IPNAV, LLC who expressed his clients would be opposing the motion. Based on availability currently communicated, we plan to hold three separate teleconferences any of which can be selected by counsel depending on which is most convenient for the Local Rule 7.1.1. discussions on our firm’s conference line, 302-575-1736:

1. Wednesday, March 23, 2022 at 12:00 a.m. EST;
2. Thursday, March 24, 2022 at 2:00 p.m. EST; and

The Honorable Maryellen Noreika

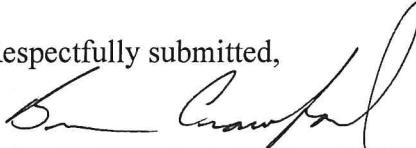
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3. Thursday, March 24, 2022 at 4:00 p.m. EST if counsel cannot attend either of the prior two teleconferences.

If the Court has any questions or concerns, we are available at the convenience of the Court.

Respectfully submitted,


Brian C. Crawford, DE Bar #4941

cc: Geoffrey Graham Grivner, Esq. (*via electronic noticing*)
Kody Macgyver Sparks, Esq. (*via electronic noticing*)
Stephen B. Brauerman, Esq. (*via electronic noticing*)
Ronald P. Gold, III, Esq. (*via electronic noticing*)
James Harry Stone Levine, Esq. (*via electronic noticing*)
Dylan M. Schmeyer, Esq. (*via electronic noticing*)
Akiva M. Cohen, Esq. (*via electronic noticing*)
Steve L. Rader, Esq. (*via electronic noticing*)
Jason R. Dilday, Esq. (*via electronic noticing*)